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Attorneys for Defendant Watch Tower Bible and Tract Society of Pennsylvania

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

TRACY CAEKAERT and CAMILLIA MAPLEY,

Plaintiffs.

-VS-

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and BRUCE MAPLEY SR.,

Defendants.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., and WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, Case No. CV-20-00052-SPW-TJC

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFFS' MOTION FOR SANCTIONS Cross-Claimants,

-VS-

BRUCE MAPLEY SR.,

Cross-Defendant.

Defendant Watch Tower Bible and Tract Society of Pennsylvania ("WTPA") respectfully moves the Court to extend the time to file WTPA's Response to Plaintiffs' Motion for Sanctions (Doc. 101) up to and including Tuesday, December 28, 2021.

Counsel for WTPA have contacted Plaintiffs' counsel, who do not object to this extension of time. Pursuant to L.R. 7.1(c)(3), a proposed order is filed herewith and emailed to the Court.

DATED this 17th day of December, 2021.

MOULTON BELLINGHAM PC

By <u>/s/ Jordan W. FitzGerald</u>

GERRY P. FAGAN CHRISTOPHER T. SWEENEY JORDAN W. FITZGERALD 27 North 27th Street, Suite 1900 P.O. Box 2559 Billings, Montana 59103-2559

Attorneys for Watch Tower Bible and Tract Society of Pennsylvania

CERTIFICATE OF SERVICE

I hereby certify that on 17th day of December, 2021, a copy of the foregoing was served on the following persons:

U.S. District Court, Billings Division 1. 2. Robert L. Stepans Ryan R. Shaffer James C. Murnion MEYER, SHAFFER & STEPANS, PLLP 430 Ryman Street Missoula, MT 59802 Attorneys for Plaintiffs Guy W. Rogers Joel M. Taylor, Esq. (pro hac vice) 3. MILLER MCNAMARA & TAYLOR LLP Jon A. Wilson Brett C. Jensen 100 South Bedford Road, Suite 340 BROWN LAW FIRM, P.C. Mount Kisco, NY 10549 315 North 24th Street P.O. Drawer 849 Billings, MT 59103-0849 Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc. Bruce G. Mapley, Sr. 4. 3905 Caylan Cove Birmingham, AL 35215 By the following means: 1, 2, 3 CM/ECF Fax Hand Delivery E-Mail U.S. Mail Overnight Delivery Services

By /s/ Jordan W. FitzGerald